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March 24, 2023

**DELIVERED VIA ECF**

Honorable Lorna G. Schofield  
U.S. District Judge  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Application GRANTED IN PART.** The conference scheduled for April 5, 2023, is **ADJOURNED to April 12, 2023, at 4:10 P.M.** The conference will be telephonic and will take place on the following line: 888-363-4749, access code 558-3333. The parties shall file the joint letter and proposed case management plan by **April 5, 2023.** So Ordered.

**Dated: March 27, 2023**  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**Case Title:** *Ayiomamitis v. Hellas Journal, Inc. et al*  
**Case Number:** 1:23-cv-01175-LGS  
**Re:** Request to Adjourn Initial Pretrial Conference

Your Honor:

I represent Plaintiff in the above-referenced action. I write, with consent of defense counsel, to respectfully request a 60-day adjournment of the Initial Pretrial Conference currently scheduled for April 5, 2023 at 4:10 p.m. This is the first request for an extension.

Plaintiff requests an adjournment for two reasons: 1) Defendant has not yet appeared or filed an answer; and 2) Plaintiff has executed a waiver as to Hellas Journal, Inc. which continued its answer to May 22, 2023. The requested extension would provide the time necessary for Defendant to respond and allow all parties to participate in preparing the joint Rule 26(f) submissions.

For these reasons, Plaintiff respectfully requests an adjournment of the Initial Pretrial Conference to sometime after Defendant Hellas Journal, Inc. has appeared in this matter. This is the first request of this nature that has been made and, as mentioned above, Defendant consents to the relief sought. We thank Your Honor for your consideration of this request.

Respectfully submitted,

By: /s/ Scott Alan Burroughs  
Scott Alan Burroughs  
DONIGER / BURROUGHS